

MELINDA HAAG (CABN 132612)  
United States Attorney

MIRANDA KANE (CABN 150630)  
Chief, Criminal Division

ANDREW M. SCOBLE (CABN 124940)  
MATTHEW L. McCARTHY (CABN 217871)  
Assistant United States Attorneys  
450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-7249/6838  
Fax: (415) 436-7234  
E-Mail: [andrew.scoble@usdoj.gov](mailto:andrew.scoble@usdoj.gov)  
[matthew.mccarthy@usdoj.gov](mailto:matthew.mccarthy@usdoj.gov)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
DAVIE JIMMY MEJIA-SENSENTE, )  
a/k/a "Crazy," )  
a/k/a "Loco," )  
CARLOS MEJIA-QUINTANILLA, )  
a/k/a "Wilfredo Oliva-Castro," )  
a/k/a "Sleepy," )  
a/k/a "Dormido," )  
LUIS AMILAR-ZANAS, )  
a/k/a "Luis Sana," )  
a/k/a "Trucha," )  
a/k/a "Yomo," )  
Defendants. )

No. CR 11-0293 CRB  
**STIPULATION AND [PROPOSED]  
ORDER CONTINUING STATUS  
CONFERENCE AND EXCLUDING  
TIME**  
SAN FRANCISCO VENUE  
Current Date: April 25, 2012  
Proposed Date: June 6, 2012

1       The above-captioned case is currently scheduled for a status conference Wednesday,  
2 April 25, 2012. However, the government will soon produce additional discovery pursuant to  
3 the Protective Order, and defense counsel will require additional time to review that discovery.  
4 In addition, counsel for the government will be unavailable on April 25, 2012.

5       Accordingly, the parties now stipulate and jointly request that the status conference currently  
6 set for April 25, 2012 be vacated, and that the Court set this matter for a status conference on  
7 June 6, 2012.

8       Further, the parties stipulate April 25, 2012 through June 6, 2012 for effective preparation of  
9 counsel. The exclusion of time is necessary in light of the time needed to produce and review  
10 the requested discovery. The parties agree that the ends of justice served by granting such a

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1 continuance outweighed the best interests of the public and the defendant in a speedy trial. *See*  
2 18 U.S.C. § 3161(h)(8)(A).

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4 IT IS SO STIPULATED:

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6 MELINDA HAAG  
7 United States Attorney

8 DATED: 4-12-12 By: \_\_\_\_\_/s/  
9 ANDREW M. SCOBLE  
10 MATTHEW L. McCARTHY  
11 Assistant United States Attorneys

12 DATED: 4-12-12 By: \_\_\_\_\_/s/  
13 DAVID ANDERSON  
14 Attorney for Defendant  
15 DAVIE JIMMY MEJIA-SENENTE

16 DATED: 4-12-12 By: \_\_\_\_\_/s/  
17 JAMES McNAIR THOMPSON  
18 Attorney for Defendant  
19 CARLOS MEJIA-QUINTANILLA

20  
21 DATED: 4-12-12 By: \_\_\_\_\_/s/  
22 TONY TAMBURELLO  
23 Attorney for Defendant  
24 LUIS AMILAR-ZANAS

1                           **[PROPOSED] ORDER**

2                           For good cause shown, the status conference now scheduled for April 25, 2012 is  
3 vacated. The matter shall be added to the Court's calendar on June 6, 2012 for setting of future  
4 dates.

5                           In addition, for the reasons stated above, the Court finds that an exclusion of time  
6 from April 25, 2012 through June 6, 2012 is warranted and that the ends of justice served by the  
7 continuance outweigh the best interests of the public and the defendant in a speedy trial. See 18  
8 U.S.C. §3161 (h)(7)(A). The failure to grant the requested continuance would deny defense  
9 counsel the reasonable time necessary for effective preparation, taking into account the exercise  
10 of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(7)(B)(iv).

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12                           IT IS SO ORDERED.

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14                           04/20/2012  
15                           \_\_\_\_\_  
16                           DATED

